

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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JAMES McLAUGHLIN and	:	CIVIL ACTION
FRANCISCO McLAUGHLIN	:	
Plaintiffs	:	
	:	
vs.	:	
	:	
DAVID WILLIAMS and	:	
C. R. ENGLAND, INC.	:	
Defendants	:	NO. 02-CV-2996

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**PLAINTIFFS' REQUEST FOR ENTRY OF DEFAULT**  
**AGAINST DEFENDANT, DAVID WILLIAMS**

Plaintiffs, James McLaughlin and Francisco McLaughlin, by and through counsel, Stephen W. Bruccoleri, Esquire, hereby request that the Clerk enter default against Defendant, David Williams, and in support thereof avers the following:

1. The Complaint in this matter was filed on April 18, 2002 in the Court of Common Pleas, Philadelphia County.
2. The Complaint was served upon the Defendant, David Williams, in accordance with the Pennsylvania Rules of Civil Procedure on May 10, 2002. (See Affidavit of Service filed with the Court of Common Pleas, Philadelphia County, on May 16, 2002 attached hereto as Exhibit "1".)
3. The time within which the Defendant, David Williams, may answer or otherwise plead to the Complaint has expired and no extension has been granted.
4. Accordingly, it is respectfully requested that the Court enter default against

Defendant, David Williams.

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STEPHEN W. BRUCCOLERI, ESQUIRE  
Identification No. 32334  
Attorney for Plaintiffs  
Eight Penn Center, Suite 1900  
1628 John F. Kennedy Boulevard  
Philadelphia, PA 19103  
(215) 563-4440

Date: August 22, 2002

**CERTIFICATION OF SERVICE**

Stephen W. Bruccoleri, Esquire hereby certifies that he has served a true and correct copy of the within pleading upon all counsel of record, as well as Defendant, David Williams, on the date below via U.S. Mail, postage prepaid.

Date: August 22, 2002

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STEPHEN W. BRUCCOLERI, ESQUIRE  
Attorney for Plaintiffs